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January 14, 1999

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

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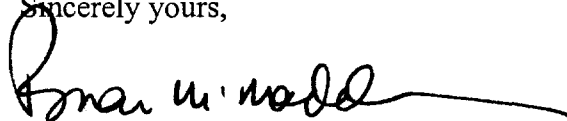
Ms. Magalie R. Salas
Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

Dear Ms. Salas:

On behalf of Sarkes Tarzian, Inc., licensee of Station WRCB-TV, Chattanooga, Tennessee, there are transmitted herewith an original and five copies of its *Petition for Rule Making* proposing a substitution of Channel 13 for Channel 55 at Chattanooga, Tennessee, in the DTV Table of Allotments for use by Station WRCB-TV.

If any additional information is desired in connection with this matter, please contact the undersigned counsel.

Sincerely yours,



Brian M. Madden

BMM/tlm
Enclosure
cc: Gordon Godfrey (FCC)

ORIGINAL

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

In the Matter of

Amendment of Section 73.622(b)
Table of Allotments, DTV Broadcast Stations
(Chattanooga, Tennessee)

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

PETITION FOR RULE MAKING

Sarkes Tarzian, Inc. ("STI"), licensee of Station WRCB-TV, Chattanooga, Tennessee, by its attorneys and pursuant to the provisions of Section 1.401 of the Commission's rules, hereby requests that the Commission institute a rule making proceeding to amend Section 73.622(b), the DTV Table of Allotments, by substituting Channel 13 as the DTV allocation for transitional DTV use by Station WRCB-TV in lieu of Channel 55, as originally allotted.

As shown in the accompanying engineering statement prepared by Bernard R. Segal, P.E. ("*Engineering Statement*"), Channel 13 may be allotted for DTV use by Station WRCB-TV, operating from the station's licensed NTSC transmitter site.

The Engineering Statement establishes that STI's proposal is in full accord with all applicable coverage and allocation criteria set forth in the Commission's rules. The proposed operation on Channel 13 provides full coverage over Chattanooga, Tennessee, the community of license of Station WRCB-TV, as required by Section 73.623(c)(1) of the rules. See *Engineering Statement*, p. 2 and Figure 3. No NTSC station would receive interference from the DTV operation of Station WRCB-TV on Channel 13 which might affect any populated area to an

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extent which would exceed the standards adopted by the Commission as acceptable *de minimis* interference, as required by Section 73.623(c)(2) of the rules. *Id.* at pp. 3-4 and Figure 5.

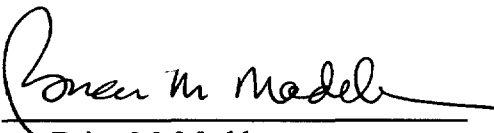
The substitution of Channel 13 for DTV operation by Station WRCB-TV in lieu of Channel 55, as now assigned, will allow STI to operate during the transition period on a channel which is within the spectrum "core" designated by the Commission, and would obviate the need for STI to select and move to an alternative channel for DTV operation for use in the future. Upon the Commission's grant of this petition for modification of the DTV allocation by the substitution of Channel 13 for Channel 55 for DTV use by Station WRCB-TV, STI will timely file an application specifying the operation of Station WRCB-DT on Channel 13 and will adhere to all applicable Commission standards for the construction and initiation of operation of its DTV facility.

THEREFORE, for the reasons set forth above, a rule making proceeding should be instituted proposing the amendment of Section 73.622(b) of the Commission's rules to

substitute Channel 13 for Channel 55 in the DTV Table of Allotments for use by Station WRCB-TV.

Respectfully submitted,

SARKES TARZIAN, INC.

By: 
Brian M. Madden

Leventhal, Senter & Lerman, P.L.L.C.
2000 K Street, N.W.
Suite 600
Washington, DC 20006-1809
(202) 429-8970

January 14, 1999

Its Attorneys

**ENGINEERING STATEMENT
PREPARED ON BEHALF OF
SARKES TARZIAN, INC.
CHATTANOOGA, TENNESSEE**

The instant Engineering Statement has been prepared on behalf of Sarkes Tarzian, Inc., licensee of NTSC television station WRCB-TV, Chattanooga, Tennessee. Engineering support is provided for a petition to amend the DTV Table of Allotments, Section 73.622(b) of the Rules. The FCC allotted Ch. 55 for transitional DTV use for NTSC station WRCB-TV. Station WRCB-TV operates on VHF Ch. 3. The instant Engineering Statement provides support for amendment of the DTV Table of Allotments to specify Ch. 13 in lieu of Ch. 55.

The proposed Ch. 13 DTV allotment is for operation from the same site as is currently employed for the current NTSC operation for WRCB-TV. A directional antenna is proposed and the maximum average effective radiated power will be 37 kW. The antenna will be a panel type which will be side mounted on either a refurbished or replacement tower at the WRCB-TV site. Figure 1 is the manufacturer's supplied radiation pattern for the directional antenna. Figure 2 is a tabulation of radiation data for the pattern of Figure 1.

The antenna radiation center height above average terrain will be 325 meters, corresponding to a radiation center height of 705 meters above mean sea level. The geographic coordinates for the site are: 35° 09' 40" North Latitude; 85° 18' 52" West Longitude. Terrain elevations from 3.2-16.1 km were obtained from the National Geophysical Data Center 30-second database.

In compliance with the requirements of Section 73.623(c), studies are provided which demonstrate that the change in the allotment table, as proposed herein, satisfies the coverage and allocation criteria of the FCC Rules. Figure 3 is a map demonstrating the extent of coverage of the 36 dB μ , F(50,90) contour for the proposed allotment. Figure 4 is a tabulation of terrain elevation data and distances to the 36 dB μ , F(50,90) contour for the proposed allotment facilities. In order to provide better definition of the coverage contour than could be obtained from use of only the standard 45°-spaced radials, additional radials at 15° intervals were employed, but just the eight standard radials were used for determining the overall averages. Figure 3 demonstrates that the entire community of Chattanooga would be encompassed by the proposed operation in conformance with the requirement of Section 73.625(a).

As to allocation concerns, the study provided herein as Figure 5 demonstrates that no NTSC station would receive interference from the proposed WRCB-DT, Ch. 13, facility affecting population in excess of the "de minimis" 2% allowable level. Other than for the interference that would be imposed by the proposed WRCB-DT operation, none of the affected stations receives interference from any other DTV allotment. Thus, no question of cumulative interference exceeding the 10% maximum permitted by the Rules arises. No DTV station or allotment is sufficiently close to the proposed Ch. 13 allotment for WRCB-DT to merit consideration.

The study of Figure 5 was performed using an FCC matched computer analysis taking into account both NTSC and DTV allocation factors. A computer using an Alpha processor was employed in conjunction with the FCC's FLR software. For each station studied, the reference information from Appendix B of the *Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket Number 89-268* is listed in Figure 5 for comparison with the results obtained independently using the Alpha processor with the FCC's FLR software. The independently determined calculation results are in good agreement with the FCC's Appendix B results.

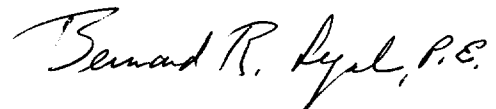
Bernard R. Segal, P.E.
Consulting Engineer
Washington, DC

Engineering Statement
Sarkes Tarzian, Inc., Chattanooga, Tennessee

Page 4

Two studies were performed. The first study took into account the current Appendix B allotment facilities and provided a reference for comparison with the second study which included the effect of the proposed new Ch. 13 DTV allotment. In no instance would the FCC allowable 2% de minimis interference level be exceeded toward any NTSC station. As mentioned earlier, there are no DTV stations or allotments which are impacted by the proposed Ch. 13 allotment for WRCB-DT. The proposed allotment satisfies all FCC criteria.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 13, 1999.



Bernard R. Segal, P.E

Dielectric

Proposal Number

DCA-8157

Date

13-Jan-99

Call Letters

WRCB-DT

Channel

13

Location

Chattanooga, TN

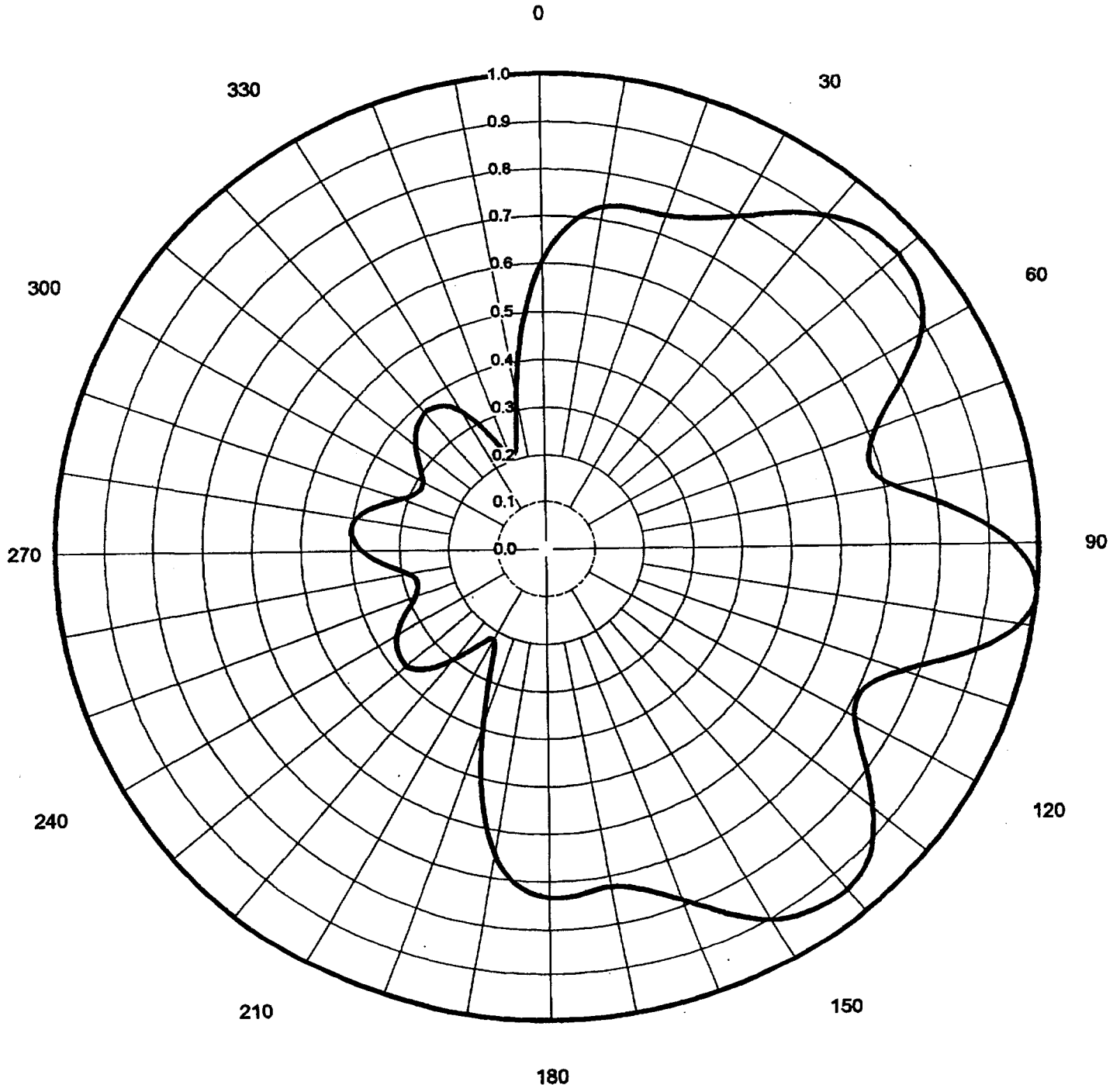
Customer

Sarkes Tarzian Inc.

Antenna Type

THP-SP4-2-1-R

AZIMUTH PATTERN

Gain
Calculated / Measured**2.40****(3.80 dB)**
CalculatedFrequency
Drawing #**213.00 MHz****THP-SP4-13**

**ENGINEERING STATEMENT
PREPARED ON BEHALF OF
SARKES TARZIAN, INC.
CHATTANOOGA, TENNESSEE**

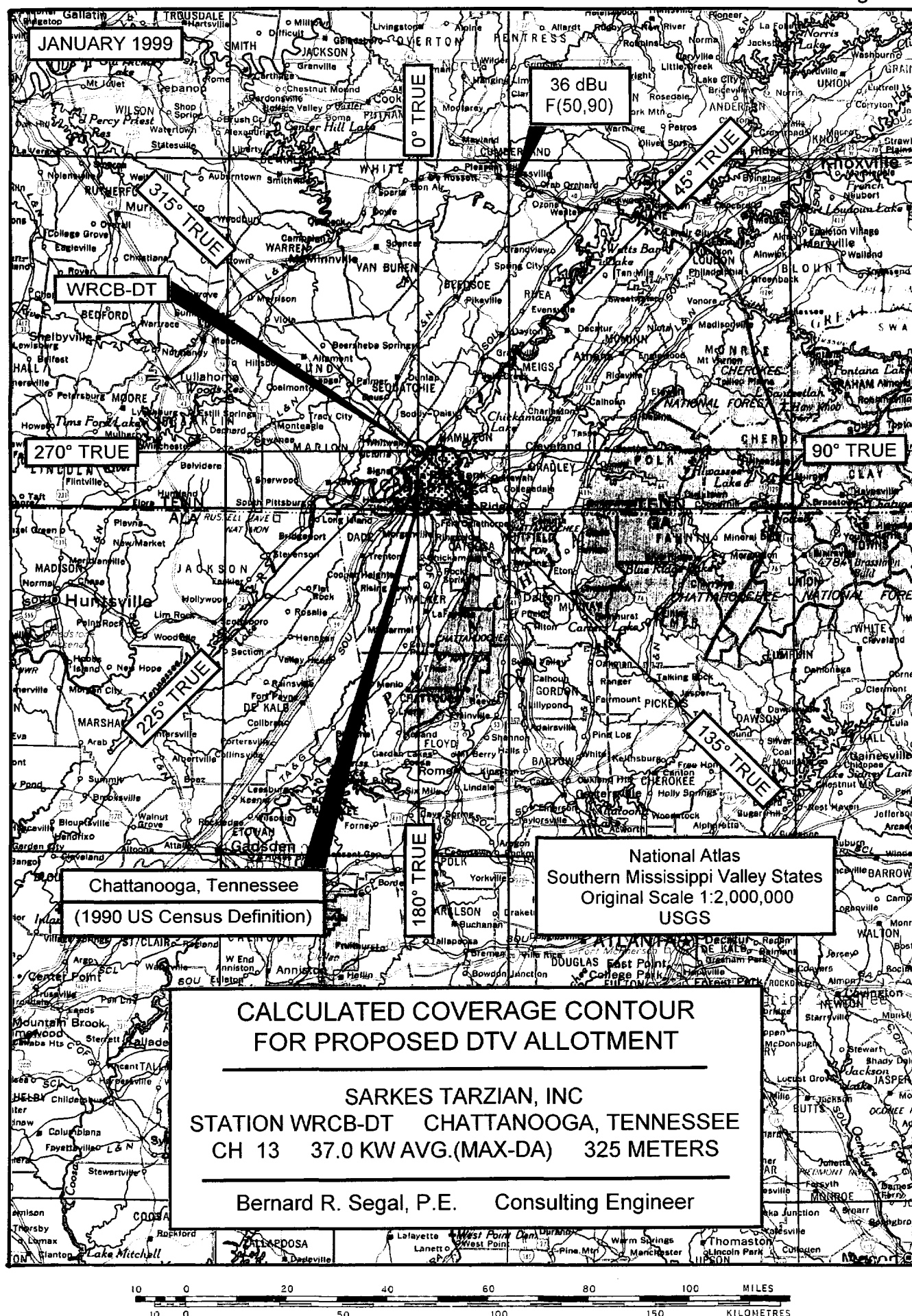
Tabulation of Data for Radiation Pattern

<u>Azimuth</u> (deg. T)	<u>Relative</u> <u>Field</u>	<u>Effective</u> <u>Radiated</u> <u>Power</u> (kW)	<u>Azimuth</u> (deg. T)	<u>Relative</u> <u>Field</u>	<u>Effective</u> <u>Radiated</u> <u>Power</u> (kW)
0	0.603	13.5	180	0.733	19.9
10	0.727	19.6	190	0.651	15.7
20	0.740	20.3	200	0.391	5.66
30	0.799	23.6	210	0.218**	1.76
40	0.902	30.1	220	0.300	3.33
50	0.945*	33.0	230	0.378*	5.29
60	0.886	29.0	240	0.354	4.64
70	0.715	18.9	250	0.286	3.03
75	0.682**	17.2	255	0.273**	2.76
80	0.719	19.1	260	0.288	3.07
90	0.947	33.2	270	0.378	5.29
96	1.00*	37.0	277	0.401*	5.95
100	0.976	35.2	280	0.393	5.72
110	0.770	21.9	290	0.313	3.63
117	0.706**	18.4	297	0.284**	2.98
120	0.720	19.2	300	0.289	3.09
130	0.858	27.2	310	0.343	4.35
140	0.943*	32.9	320	0.380*	5.34
150	0.903	30.2	330	0.339	4.25
160	0.787	22.9	340	0.215	1.71
170	0.722**	19.3	342	0.211**	1.65
179	0.734*	19.9	350	0.325	3.91

*Local maximum

**Local minimum.

Figure 3



**ENGINEERING STATEMENT
PREPARED ON BEHALF OF
SARKES TARZIAN, INC.
CHATTANOOGA, TENNESSEE**

Tabulation of Average Elevations and
Distances to the DTV Coverage Contour

<u>Azimuth</u> (deg. True)	<u>3.2-16.1 km</u> <u>Terrain Average</u> (mAMSL)	<u>Rad. Ctr.</u> <u>Above Terrain</u> <u>Average</u> (m)	<u>ERP</u> <u>Employed</u> (kW)	<u>Distance to</u> <u>36 dBμ F(50,90)</u> <u>Coverage Contour</u> (km)
0*	534	171	13.5	86.3
15	519	186	19.9	90.3
30	518	187	23.6	91.6
45*	370	335	31.6	104.2
60	245	460	29.0	113.8
75	223	482	17.2	110.6
90*	236	469	33.2	115.7
105	227	478	28.2	114.8
120	231	474	19.2	111.1
135*	220	485	30.0	115.8
150	227	478	30.2	115.5
165	225	480	21.1	112.3
180*	223	482	19.9	111.9
195	250	455	10.0	103.5
210	444	261	1.8	77.1
225*	431	274	4.3	84.5
240	381	324	4.6	88.1
255	522	183	2.8	75.5
270*	497	208	5.3	82.4
285	478	227	4.6	82.7
300	509	196	3.1	77.4
315*	531	174	4.8	79.2
330	580	125	4.3	71.6
345	571	134	2.4	68.4
Overall average	380	325		

* Radial data used in determining the overall averages.

**ENGINEERING STATEMENT
PREPARED ON BEHALF OF
SARKES TARZIAN, INC.
CHATTANOOGA, TENNESSEE**

NTSC Allocation Study for Proposed WRCB-DT Allotment
Ch. 13, 37 kW (MAX-DA), 325 m

NAD 27 Site Coordinates: 35° 09' 40" North Latitude
85° 18' 52" West Longitude

Antenna Radiation Center: 77 mAGL; 705 m AMSL
Site Elevation: 628 m

Ch. Relation- ship	Potentially Affected NTSC Station	Appendix B Data		Independent Calculations					
		Current Service Pop. (Thous)	Allotted DTV Interf. (%)	Current Service Pop. (Thous)	Noise- Limited Pop. (Thous)	Allotted DTV Interf		New Interf. from Prop. WRCB-DT	
						(Thous)	(%)	(Thous)	(%)
n-0	WTMV-TV, Birmingham, AL Ch. 13, 316 kW, 408 m	1,465	0.0	1,475	1,514	0	0.0	27	1.8
n-0	WMAZ-TV, Macon, GA Ch. 13, 316 kW, 238 m	590	0.0	594	661	0	0.0	0	0.0
n-0	WBKO, Bowling Green, KY Ch. 13, 316 kW, 226 m	466	0.0	467	515	0	0.0	8	1.6
n-0	WLOS, Asheville, NC Ch. 13, 178 kW, 853 m	1,786	0.0	1,775	1,852	0	0.0	34	1.8
n-1	WDEF-TV, Chattanooga, TN Ch. 12, 316 kW, 384 m	1,001	0.0	1,003	1,033	0	0.0	0	0.0

n=DTV Ch. 13